



Page 1 of 3
Westinghouse Electric Company LLC
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USA

U. S. Nuclear Regulatory Commission
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Your ref:
Our ref: LTR-RAC-07-79
October 19, 2007

SUBJECT: REPLY TO A NOTICE OF VIOLATION
REPLY TO A NOTICE OF NONCONFORMANCE
REFERENCE: NRC REPORT NO: 99900005/2007-201

Pursuant to the provisions of 10 CFR 2.201, Westinghouse Electric Company LLC herein provides formal response to your letter of September 28, 2007, regarding your inspection of the Westinghouse Nuclear Fuel (WNF) facility in Columbia, South Carolina on August 27-29, 2007.

Appendix A provides our response to the violation of NRC requirements specified in the Notice of Violation. Appendix B provides our response to the nonconformance specified in the Notice of Nonconformance.

I hereby affirm that the statements made in this response are true and correct to the best of my knowledge and belief. Should you have any questions or require additional information, please contact Mr. Dave Harris of my staff at 803-647-3769.

Sincerely,

WESTINGHOUSE ELECTRIC COMPANY LLC

A handwritten signature in black ink, appearing to read 'Cary D. Alstadt', written over a horizontal line.

Cary D. Alstadt, Manager
Columbia Fuel Fabrication Facility

Attachments: Appendix A
Appendix B

cc: U. S. Nuclear Regulatory Commission
Director, Division of Engineering
Office of Nuclear Reactor Regulation
Washington, DC 20555-0001

TE09
NRC

APPENDIX A

WESTINGHOUSE RESPONSE TO NOTICE OF VIOLATION

A.1 The following information is provided in response to the violation described in your September 28, 2007 letter.

~~A.1.a~~ **ACKNOWLEDGEMENT OF THE VIOLATION**

The violation is correct as stated in the Notice of Violation.

A.1.b REASON FOR THE VIOLATION

The reason for the violation is that the level of detail in the Electronic Problem Notice procedure was less than adequate in that it was assumed that the user was already cognizant of the requirement to report conditions adverse to safety in the Corrective Action Process (CAPs).

A.1.c CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Procedure QA-617, *Processing an EPN (Electronic Problem Notice)*, has been revised to include additional criteria for when to create a CAPs issue. The list includes:

- Deviations that are the result of an error in the details provided in a design document (i.e., drawing, specification, etc.) or require design engineering evaluation.
- Deviations that are the result of an error in the details provided in a fabrication document.
- Deviations in the details of a purchasing document that result in non-conforming product.

A review of other nonconformance / deviation procedures to assure proper instructions were given related to performing the appropriate evaluation for 10CFR21 applicability revealed no other issues.

A.1.d ACTIONS TO PREVENT RECURRENCE

In addition to revising procedure QA-617, the notice of violation was communicated to each of the U.S. Fuel Manufacturing sites for use as operating experience.

A.1.e DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on October 18, 2007 when procedure QA-617, Revision 17 was released for use in the Electronic Training and Procedure System (ETAPS).

APPENDIX B

WESTINGHOUSE RESPONSE TO NOTICE OF NONCONFORMANCE

B.1 The following information is provided in response to the nonconformance described in your September 28, 2007 letter.

B.1.a **ACKNOWLEDGEMENT OF THE NONCONFORMANCE**

The nonconformance is correct as stated in the Notice of Nonconformance.

B.1.b **CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED**

The Notice of Nonconformance was entered into CAPs.

An evaluation was performed, and an Engineering Change Notice was approved to revise the surface finish requirement in the leaf-spring tang window.

Procedure QCS-1 / PF102, "*Supplier Quality System Requirements, Level 1*" was revised on October 18, 2007 to incorporate Part 1 of the approved 1994 edition where reference is made to NQA-1.

In addition to revising QCS-1 / PF102, the notice of violation was forwarded to each of the Nuclear Business Units in Westinghouse for use as operating experience.

B.1.c **ACTIONS TO PREVENT RECURRENCE**

Revise the leaf spring design drawings.

Enter QCS-1 / PF 102, Revision 2 into ETAPS to prompt an automatic annual review of the document to ensure continuing compliance with quality requirements.

B.1.d **CORRECTIVE AND PREVENTIVE ACTIONS COMPLETION DATE**

Revision of the leaf spring design drawings will be completed by December 1, 2007.

The preventive action to get QCS-1 / PF 102 into ETAPS will be completed by October 26, 2007.

Procurement documents for active qualified Westinghouse suppliers that include reference to QCS-1 / PF 102 Revision 1, will be revised to reference Revision 2 by January 31, 2008.